

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,

) I N D I C T M E N T

Plaintiff,

) 5 : 22 CR 70

v.

) CASE NO.

DILLON JAMES JODON,

) Title 18, United States Code,  
Section 1349

Defendant.

JUDGE JODI

GENERAL ALLEGATIONS

At all times material and relevant to this Indictment:

1. Defendant DILLON JAMES JODON was a resident of Summit County, Ohio, which was located in the Northern District of Ohio, Eastern Division.
2. Victim T.P. was a real person, known to the Grand Jury.
3. Bank 1 was a financial institution, as defined under Title 18, United States Code, Section 20, the deposits of which was insured by the Federal Deposit Insurance Corporation.

COUNT 1

(Conspiracy to Commit Bank Fraud, 18 U.S.C. § 1349)

The Grand Jury charges:

4. Paragraphs 1 through 3 of this Indictment are realleged and incorporated by reference as if fully set forth herein.
5. From on or about August 2, 2021 through on or about August 3, 2021, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant DILLON JAMES JODON, and other persons, both known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate and agree together and with each other to

knowingly, and with the intent to defraud, execute and attempt to execute a scheme and artifice to defraud a financial institution and to obtain any of the moneys, funds, credits, assets, securities, or other property owned by, and under the custody or control of, a financial institution, by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344.

OBJECT OF THE CONSPIRACY

6. The objects of the conspiracy were to: (1) defraud the financial institution; (2) obtain any of the moneys, funds, credits, assets, securities, or other property owned by, or under the custody or control of, a financial institution; (3) enrich the conspirators; and (4) avoid detection of the conspiracy.

MANNER AND MEANS OF THE CONSPIRACY

7. It was part of the conspiracy that:

- a. A member of the conspiracy stole mail from the mailboxes of victims to obtain personal identifying information (PII), checks, and credit cards.
- b. A member of the conspiracy possessed and used a means of identification of the victims.

ACTS IN FURTHERANCE OF THE CONSPIRACY

8. In furtherance of the conspiracy, and to affect the goals and conceal the existence thereof, Defendant DILLON JAMES JODON, and others performed the following acts in the Northern District of Ohio, Eastern Division, and elsewhere:

Victim T.P.

- a. In or around August 2, 2021, members of the conspiracy stole mail from T.P.'s mailbox which included a Bank 1 debit card, account ending in x9575.
- b. On or about August 2, 2021, members of the conspiracy used T.P.'s Bank 1 debit card, account ending in x9575, to pay for a U-Haul truck.
- c. On or about August 2, 2021, JODON used T.P.'s Bank 1 debit card, account ending in x9575, to purchase items at a Circle K gas station.
- d. On or about August 3, 2021, JODON used T.P.'s Bank 1 debit card, account ending in x9575, to secure a hotel room under A.C.'s name.

All in violation of Title 18, United States Code, Section 1349.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.